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May 1, 2006

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RECEIVED

Federal Communications Commission Office of Secretary

Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street, S.W. Washington, D.C. 20554

Re:

CC Docket 94-102

E911 Handset Penetration Quarterly Report

East Kentucky Network, LLC d/b/a Appalachian Wireless

Dear Ms. Dortch:

On behalf of East Kentucky Network, LLC d/b/a Appalachian Wireless there is submitted herewith a report of the status of the carrier's progress in achieving 95% systemwide handset of location-capable handsets.

Appalachian Wireless is a Tier III digital wireless carrier operating cellular radiotelephone services in Kentucky RSAs 9 and 10. This report is submitted in compliance with the terms of the *Order*, CC Docket No. 94-102, FCC 06-02, released January 13, 2006, conditionally granting Appalachian Wireless An extension of the deadline through June 30, 2006, for compliance with Section 20.18(g)(1)(v) of FCC rules, 47 C.F.R. § 20.18(g)(1)(v).

Pursuant to Sections 0.457(d) and 0.459 of FCC Rules, it is hereby requested that the information reported herein be treated by the Commission as confidential, and be withheld from public inspection. The information, which would not customarily be released to the public, is confidential commercial information, and should be protected in accordance with Sections 0.457(d) and 0.459 of FCC Rules.

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May 1, 2006 Federal Communications Commission Page two

Should any questions arise with respect to this matter, please feel free to communicate directly with the undersigned.

Very truly yours,

Pamela L. Gist

# EAST KENTUCKY NETWORK, LLC D/B/A APPALACHIAN WIRELESS E911 REPORT

### MAY 1, 2006

The following information is submitted in accordance with FCC directive:

#### 1. The number and status of Phase II requests from Public Safety Answering Points

A total of thirteen PSAPs are located within Appalachian Wireless' service area. All have requested Phase II services and have become or are becoming capable of receiving and utilizing Phase II data. Appalachian Wireless works with Intrado to deploy and optimize E911 services on Appalachian Wireless' CDMA network system and to test the data with the PSAPs. Since Appalachian Wireless' last report, Intrado has populated information in the Base Station Almanac for the Position Determining Equipment, has loaded the values from the Almanac into Intrado's equipment, and has begun testing.

Appalachian Cellular continues to work with other PSAPs to deploy Phase II services, according to consented schedules. For example, the 911 coordinator for Johnson County reports that they are having a problem with their CAD provider. He has agreed to contact Appalachian Wireless once the issue has been resolved so that testing may resume. Likewise Powell County, Kentucky, is not yet completely Phase II ready. Appalachian has attempted to test with this PSAP, but has been informed by the PSAP that the PSAP is not ready to test.

Work is pending with Pike County, Kentucky, serviced by Kentucky State Police Post 9, and with Letcher, Breathitt and Knott Counties, serviced by Kentucky State Police Post 13. The next step will be to commence testing with those PSAPs. Progress also continues for Dickenson County, Virginia. The necessary trunks have been ordered and installed, although challenges remain in getting the circuits to work between Appalachian Wireless' Mobile Switching Center and Verizon's selective routers in Norton and Blacksburg, Virginia, which serve Dickenson County. In anticipation of resolution of that problem, Intrado has loaded the necessary E911 data for Dickenson County. Phase II services should become active in Dickenson County in about June 2006.

## 2. The dates on which Phase II service has been implemented or will be available to PSAPs served by Appalachian Wireless' wireless network

In the second half of March Appalachian Wireless successfully deployed Phase II services in seven PSAPS: City of Prestonsburg, Lawrence County, Lee County, Kentucky State Police Post 8, Kentucky State Police Post 9, Estill County and Morgan County. Work is progressing with Perry County, Kentucky, which at first had trouble with is CAD system. Appalachian Wireless was able to assist with the problem and that issue has been resolved. Appalachian will troubleshoot new equipment issues with the PSAP, and hopefully deploy Phase II services in the coming days.

While the circumstances of the PSAPs are not within is control,
Appalachian Wireless estimates that Phase II services will become active in
Johnson, Powell and Dickenson Counties in about June 2006. Phase II services

should become active with Kentucky State Police Post 9 and Post 13 in August 2006. All of the PSAPs have consented to their activation schedules for deployment of Phase II services.

### 3. The status of coordination efforts with PSAPs for alternative 95% handset penetration dates

Appalachian Wireless is actively working with the PSAPs to keep them informed of the carrier's progress in achieving higher location-capable handset penetration rates. Appalachian Wireless' E911 coordinator, Jamie Thacker reports to each of the thirteen PSAPs the carrier's progress on Phase II deployment and the penetration figure for location-capable handsets. The response of each PSAP has been positive. No PSAP has expressed objection to the projected schedule.

#### 4. Efforts to encourage customers to upgrade to location-capable handsets

Appalachian Wireless has notified customers as to which PSAPs located within Appalachian Wireless' service area are capable of receiving and processing the Phase II E911 data that is being delivered to them by Appalachian Wireless, and when the other PSAPs are expected to become capable. The information was distributed in billing inserts mailed February 15 and February 27, 2006, and by means of print advertising and website postings. Customers are being informed that by upgrading their handsets they will have the ability to automatically transmit their location information to emergency officials when they call 911.

Appalachian Wireless continues promotional campaigns to encourage handset upgrades. Special offers are promoted via print ads, direct mail, billing inserts, television, radio, on the company's web site and by signage on premises.

Ads emphasize the benefit of early renewal for TDMA and analog customers who trade in the old handsets. The campaigns offer free phones on a buy-one-get-one-free basis, on a buy-two-get-a-third-free basis, and in association with the purchase of specified numbers of minutes. Promotions for phones with cameras, ringtones, color screens and other features are used to lure customers into upgrading their handsets. Now that Phase II services are available, the ad campaigns are beginning to advertise the safety and coverage advantages of the CDMA system, and emphasize as a feature of the new phones their location assistance capabilities in the event of emergency.

#### 5. The percentage of customers with location-capable phones

As of March 31, 2006, approximately 88% of Appalachian Wireless' subscribers were using Phase II location-capable handsets. The percentage rate has risen three percentage points over the last three months.

## 6. Status in achieving compliance and whether Appalachian Wireless is on schedule to meet its revised 6/30/06 deadline

Appalachian Wireless maintains its policy of selling and activating only location-capable digital handsets. It continues to improve its CDMA network facilities and to conduct marketing campaigns to encourage consumer adoption of new handsets. While the rate of increase in the penetration rate of location capable handsets has slowed, Appalachian Wireless expects to be compliant no later than June 30, 2006.



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"You Always Get More With Appalachia

Wireless

Paging

Prepaid

On-line Store

Store Locator

### IMPORTANT SUBSCRIBER SAFETY INFORMATION

Appalachian Wireless has your safety in mind, particularly when you place a call for 911 emergency services u mobile phone. Appalachian Wireless is working with Public Safety Answering Points ("PSAPs") to enable rescu personnel to find you even if you cannot convey your location when you call. Appalachian Wireless and your lo are actively upgrading systems so that the PSAPs are capable of receiving critical location data that Appalachia will deliver to them. The work should be finished in March 2006. One exception is that emergency location serv become available in Dickenson County, Virginia, in about June 2006.

ONLY PHONES UTILIZING APPALACHIAN WIRELESS' CDMA NETWORK WILL BE CAPABLE OF TRANSA LOCATION DATA TO PSAPs. These include all phones purchased from Appalachian Wireless since April 15, : TDMA AND ANALOG PHONES DO NOT HAVE LOCATION CAPABILITY.

If you upgrade your TDMA or analog handset, your location information will be automatically transmitted to eme officials when you dial 911. Please take advantage of Appalachian Wireless' special offers on upgraded hands: and your family will be glad you did.

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